

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (*a.k.a.* PETER CHO);
ABDUL GAFFAR; SEI YOUNG YUN;
SALVACION USA, INC.; SALVACION
INTERNATIONAL, LLC; SALVACION
CO., LTD.; SALVACION R&D CENTER;
BIOSURE GLOBAL, LTD.;
INMOBILIARIA LA SALVACION, R.D.;
ROBIN ROE 1 through 10 (gender neutral
fictitious names); ABC CORPORATION 1
through 10 (fictitious names),

Defendants.

Civil Action No.: 2:23-cv-3709

Document Electronically Filed

**PLAINTIFF TRUTEK CORP.'S NOTICE OF HEARING
AND MOTION TO STAY CASE**

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shk@shk-dplc.com
Attorney for Plaintiff

PLEASE TAKE NOTICE that on March 18, 2024, or as soon as thereafter as counsel may be heard, Plaintiff Trutek Corp., by and through its counsel, shall move to stay proceedings until a final judgment has been issued on Defendants Inter Partes Review (“IPR”) proceeding with the United States Patent and Trademark Office. In support thereof, Plaintiff incorporates by reference its memorandum support filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that the movant requests the matter be decided on the papers, or in the alternative that the hearing be held remotely.

Pursuant to Local Civ. Rule 7.1(e), a copy of the proposed Order is annexed hereto.

Date: February 12, 2024

Respectfully Submitted,

/s/ Solomon M. Radner

Solomon Radner (NJ SBN 283502018)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on this 12th day of February 2024, the foregoing document was filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Solomon M. Radner

Solomon Radner (NJ SBN 283502018)

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Defendants.

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Attorney for Plaintiff

Plaintiff, TRUTEK CORP., by and through its attorneys, hereby respectfully moves this Court to stay proceedings until a final judgment has been issued on Defendants Inter Partes Review (“IPR”) proceeding with the United States Patent and Trademark Office. In support thereof, Plaintiff states the following:

1. The present lawsuit was filed on July 11, 2023.
2. On February 6, 2024, Plaintiff was advised that the filing of an IPR by the Defendants was imminent.
3. The filing of an IPR with the United States Patent and Trademark Office in regard to the validity of the patents at issue in the present case would hinder the ability for the Parties to litigate the present matter.
4. The parties have met and conferred on the requested stay. Defendants provided that they will oppose the present motion.
5. Plaintiff respectfully requests that the present case be stayed until a final judgement has been issued on Defendants IPR with the United States Patent and Trademark Office or 60 days from this Order if Defendants have failed to file an IPR as advised during that time.

WHEREFORE, Plaintiff respectfully request that the Court grant this motion staying the case pending a final judgement of the IPR, or 60 days absent an IPR filing.

Date: February 12, 2024

Respectfully Submitted,

/s/ Solomon M. Radner

Solomon Radner (NJ SBN 283502018)

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/s/ Solomon M. Radner

Solomon Radner (NJ SBN 283502018)